

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
FRANCHISE GROUP, INC., et al.,) Case No. 24-12480 (JTD)
Debtors.)
) Chapter 11
)
) (Jointly Administered)
)
) Re: Docket Nos. 7, 280
)

**NOTICE OF WITHDRAWAL OF OBJECTION OF
CERTAIN UTILITY COMPANIES TO THE DEBTORS' MOTION FOR
INTERIM AND FINAL ORDERS (I) PROHIBITING UTILITY COMPANIES FROM
ALTERING, REFUSING, OR DISCONTINUING UTILITY SERVICES, (II)
DEEMING UTILITY COMPANIES ADEQUATELY ASSURED OF FUTURE PAYMENT,
(III) ESTABLISHING PROCEDURES FOR RESOLVING OBJECTIONS BY
UTILITY COMPANIES AND DETERMINING ADDITIONAL ADEQUATE ASSURANCE
OF PAYMENT, AND (IV) GRANTING RELATED RELIEF**

American Electric Power, Ohio Edison Company, Potomac Edison Company, West Penn Power Company, Pennsylvania Electric Company, Monongahela Power Company, Metropolitan Edison Company, Pennsylvania Power Company, Jersey Central Power & Light Company, Toledo Edison Company, The Cleveland Electric Illuminating Company, Virginia Electric and Power Company d/b/a Dominion Energy Virginia, Dominion Energy South Carolina, Inc., Georgia Power Company, PSEG Long Island, Salt River Project, San Diego Gas and Electric Company, Southern California Edison Company, Baltimore Gas and Electric Company, Commonwealth Edison Company, PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Tampa Electric Company, Peoples Gas System, Inc., Entergy Arkansas,

LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Entergy Texas, Inc., Eversource Gas of Massachusetts, The Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, NStar Electric Company - Western Massachusetts, Orange & Rockland Utilities, Inc., Consolidated Edison Company of New York, Inc., Constellation NewEnergy, Inc., Constellation NewEnergy - Gas Division, LLC, CenterPoint Energy Resources Corp., New York State Electric and Gas Corporation, Rochester Gas & Electric Corporation, Florida Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, Massachusetts Electric Company, Niagara Mohawk Power Corporation, Gexa Energy, LP and Tucson Electric Power Company (collectively, the "Utilities"), hereby withdraw their *Objection* (Docket No. 280) to the *Debtors' Motion For Interim and Final Orders (I) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Utility Services, (II) Deeming Utility Companies Adequately Assured of Future Payment, (III) Establishing Procedures For Resolving Objections By Utility Companies and Determining Additional Adequate Assurance of Payment, and (IV) Granting Related Relief*(Docket No. 7), pursuant to a settlement between the Utilities and the Debtors.

Dated: December 9, 2024 WHITEFORD TAYLOR & PRESTON LLC

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and

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Massachusetts, Orange & Rockland Utilities, Inc., Consolidated Edison Company of New York, Inc., Constellation NewEnergy, Inc., Constellation NewEnergy - Gas Division, LLC, CenterPoint Energy Resources Corp., New York State Electric and Gas Corporation, Rochester Gas & Electric Corporation, Florida Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Deliver New York, Massachusetts Electric Company, Niagara Mohawk Power Corporation, Gexa Energy, LP and Tucson Electric Power Company